

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENWOOD DIVISION**

FLEXIBLE TECHNOLOGIES, INC.,

Plaintiff,

vs.

SHARKNINJA OPERATING, LLC,
SHARKNINJA MANAGEMENT
COMPANY, and SHARKNINJA SALES
COMPANY,

Defendants.

C. A. NO.: _____

**FLEXIBLE TECHNOLOGIES, INC.'S
ANSWERS TO LOCAL CIVIL RULE
26.01 INTERROGATORIES**

(JURY TRIAL DEMANDED)

Plaintiff, Flexible Technologies, Inc. ("Plaintiff" or "FTI") provides the following information pursuant to Local Civil Rule 26.01:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: There are none known to FTI at this time.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: FTI has demanded a jury trial.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: FTI is not a public company. (1) FTI is a wholly owned subsidiary of Smiths Group International Holdings, Ltd., which is a wholly owned subsidiary of Smiths Group plc, which is listed on the London Stock Exchange. (2) None. (3) None.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: FTI is domiciled and does business in this division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: FTI is not aware of the relationship of this matter to any other matter currently filed in this District.

Respectfully submitted,

s/Christopher B. Schoen
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(*pro hac vice applications to be filed*)

Attorneys for FLEXIBLE TECHNOLOGIES, INC.

January 13, 2017